



RG

From: Russell Greer RussMark@gmail.com
Subject: Re: Request for production of documents
Date: May 5, 2025 at 12:18 PM
To: Matthew Hardin matthewdhardin@gmail.com

Hello,

It's relevant because I need to find these John does and serve them.

But I'm not going to go back and forth on this. I will just file a motion for the information.

Thanks

Sent from my iPhone

On May 2, 2025, at 11:58 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good afternoon, Mr. Greer.

I am writing to follow up since you did not respond to my April 30 correspondence below. If you do not respond or cite some authority to the contrary, I will assume that you now agree 30 days is the proper deadline under Rule 33 and that you have withdrawn your demand for a response within 15 days.

Safe travels,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

Begin forwarded message:

From: Matthew Hardin <matthewdhardin@gmail.com>

Subject: Re: Request for production of documents

Date: April 30, 2025 at 9:37:05 AM EDT

To: Russell Greer <russmark@gmail.com>

Good morning,

Can you explain the basis for your assertion that you are owed a response in 15 days rather than 30 days (Rule 33 (b)(2)(A))? Additionally, I would appreciate it if you could explain how this discovery is proportional to the needs of the case in light of the stipulation at ECF No. 201 and your failure to oppose the motion at ECF No. 245.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

On Apr 30, 2025, at 5:16 AM, Russell Greer <russmark@gmail.com> wrote:

Good morning,

Please find attached my request for documents.

Thanks

<request for production of documents.pdf>